

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

ANASTASIA V. WOOTTEN,)
Plaintiff)
)
v.) Civil Action No. 6:14-cv-00013
)
COMMONWEALTH OF VIRGINIA, et al.,)
Defendants.)

**PLAINTIFF'S RESPONSES TO DEFENDANTS'
FIRST REQUESTS FOR THE PRODUCTION OF DOCUMENTS**

COMES NOW the Plaintiff, Anastasia Wootten, by counsel, and for her Responses to Defendants, Commonwealth of Virginia Department of Motor Vehicles and the Commonwealth of Virginia's (these two Defendants collectively "DMV") Requests For The Production Of Documents, states as follows:

DOCUMENT REQUESTS

1. Produce the "memorialized communications" of defendants referred to in the Complaint ¶125.

RESPONSE:

See all documents on the attached electronic storage device in the folder entitled "Response to RPD 2." Plaintiff reserves the right to supplement this response.

2. Produce any evidence of communications that support the allegation of conspiracy in Complaint ¶ 126.

RESPONSE:

See all documents on the attached electronic storage device in the folder entitled "Response to RPD 2." Plaintiff reserves the right to supplement this response.

Exh. 2

3. Produce your communications with Supinger, or with others that specifically demonstrate your support for Supinger or other Title VII protected activity.

RESPONSE:

See all documents on the attached electronic storage device in the entitled "Response to RPD 3." Plaintiff reserves the right to supplement this response.

4. Produce any log or calendar or document showing your actions *related to your employment disputes* in the twelve months prior to your job termination.

RESPONSE:

See all documents on the attached electronic storage device in the folder entitled "Response to RPD 4."

5. Produce any documents showing communications with Jennifer Dawson in the twelve months prior to your job termination.

RESPONSE:

See all documents on the attached electronic storage device in the folder entitled "Response to RPD 5." Plaintiff reserves the right to supplement this response.

6. Produce any documents showing communications with Robert Supinger in the twelve months prior to your job termination.

RESPONSE:

See all documents on the attached electronic storage device in the folder entitled
“Response to RPD 6.” Plaintiff reserves the right to supplement this response.

7. Produce any documents showing communications with David L. Stultz in
the twelve months prior to your job termination.

RESPONSE:

See all documents on the attached electronic storage device in the folder entitled
“Response to RPD 7.” Plaintiff reserves the right to supplement this response.

8. Produce any documents showing communications with Donald Boswell in
the twelve months prior to your job termination.

RESPONSE:

See all documents on the attached electronic storage device in the folder entitled
“Response to RPD 8.” Plaintiff reserves the right to supplement this response.

9. Produce any documents showing communications with Andrew Hicks in the
twelve months prior to your job termination.

RESPONSE:

See all documents on the attached electronic storage device in the folder entitled
“Response to RPD 9.” Plaintiff reserves the right to supplement this response.

10. Produce any medical evidence that reveals damage or injury claimed in this lawsuit.

RESPONSE:

None.

11. Produce all employment related information, including benefits, used to calculate any loss of wages, past or future, claimed herein.

RESPONSE:

See all documents on the attached electronic storage device in the folder entitled "Response to RPD 6." Plaintiff reserves the right to supplement this response.

12. Produce the records necessary to calculate your receipt of payments, if any, from the Virginia Employment Commission.

RESPONSE:

None.

13. Produce any other records that substantiate other damage or injury claimed in this lawsuit.

RESPONSE:

None. Plaintiff reserves the right to supplement this response.

14. Produce your federal and state tax returns for the four years prior to this Request and supplement with your 2014 return when prepared.

RESPONSE:

See all documents on the attached electronic storage device in the folder entitled

“Response to RPD 14.”

Respectfully Submitted,
ANASTASIA V. WOOTTEN

s/ Melvin E. Williams
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 11, 2015 the foregoing
document was sent via electronic mail to:

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s/ Melvin E. Williams